# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

HTC CORPORATION,

Plaintiff.

v.

C.A. No. 11-785-GMS

APPLE INC.,

Defendant.

#### JOINT CLAIM CONSTRUCTION CHART

Pursuant to paragraph 4 of the Court's Scheduling Order entered May 3, 2012 (D.I. 24), and in preparation for the claim construction hearing scheduled for February 19, 2013, the parties respectfully submit this joint claim construction chart for United States Patent Nos. 5,418,524; 5,630,152; 5,630,159; and 5,302,947.

DATED: October 31, 2012

YOUNG CONAWAY STARGATT & TAYLOR LLP MORRIS JAMES LLP

/s/Karen L. Pascale

/s/ Mary B. Matterer

Karen L. Pascale (#2903) James L. Higgins (#5021) Rodney Square 1000 North King Street Wilmington, DE 19899-0391 (302) 571-6600 kpascale@ycst.com jhiggins@ycst.com

Attorneys for Plaintiff, HTC Corporation

Richard K. Herrmann (#405) Mary B. Matterer (#2696) 500 Delaware Avenue, Suite 1500 Wilmington, Delaware 19801 (302) 888-6800 rherrmann@morrisjames.com mmatterer@morrisjames.com

Attorneys for Defendant, Apple Inc.

#### OF COUNSEL:

Thomas W. Winland
Steven M. Anzalone
Don O. Burley
John R. Alison
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP
901 New York Avenue, N.W.
Washington, D.C. 20001
(202) 408-4000

Attorneys for Plaintiff, HTC Corporation

#### OF COUNSEL:

Mark D. Fowler Christine K. Corbett Aaron Wainscoat Robert Buergi **DLA PIPER LLP (US)** 2000 University Avenue East Palo Alto, CA 94303-2214

Kathryn Riley Grasso **DLA PIPER LLP (US)**401 B Street, Suite 1700
San Diego, California 92101-4297

Attorneys for Defendant, Apple Inc.

# JOINT CLAIM CHART

### I. Patent No. 5,630,152 ("the '152 patent")

Proposed	Claims	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by	4.4		Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
HTC	1, 4	a master device	a master device and a	Claims 1, 4, and 13	A master device and a	1:16-21, 1:55 – 2:2,
		and a slave	slave device both	Figs. 1 and 4	slave device in	2:26-28, 5:36 – 8:47,
		device included	within a single	1:16-41 2:27-29	electronic form	Figs. 1, 4, Office
		in an electronic	electronic device			Action of December
		device		3:46-4:3		21, 1995 (reissued
				Prosecution History, Amendment and Remarks		July 23, 1996), pp. 2-
						9, Amendment of
				(Apr. 11, 1994)		April 11, 1994, pp. 6-13.
				Prosecution History, IDS (May 18, 1992), Motorola		13.
				Publication ADI 991R2,		
				8-Bit Microcomputers		
				(1985)		
HTC and	10, 17	selective call	device that receives	Claims 10, 17	An antenna that receives	2:14-16, 3:46-62, 3:36
Apple	10, 17	receiver	radio frequency (RF)	Fig. 4	a radio frequency (RF)	- 4:6, 4:8-20, 5:36 -
rippie		10001101	signals	2:14-16	modulated selective call	8:47, Fig. 4.
			3.8	3:46-4:17	signal, receiver circuitry	0,118
				Prosecution History,	for demodulation of the	
				Amendment and Remarks	received signal, and	
				(Apr. 11, 1994)	processor to decode and	
					correlate an address in	
					the received signal	
Apple	1-2, 4,	serial peripheral	Plain & Ordinary	Claims 1-2, 4, 7-8, and	Serial interface	Abstract, 2:26-46,
	7-8, 10-	interface (SPI)	Meaning	10-17	providing a four line	3:63 – 4:6, 5:36 –
	17			Figs. 1-6	connection	8:47, Fig. 1, 4, Office
			A SPI, i.e., a serial	Abstract		Action of January 18,
			interface including	1:9-13		1994, pp. 2-11
			four lines: a slave	1:55-2:2		(referring to Original
			select line, a master	2:31-47		Specification at p. 6,
			out slave in line	2:57-3:15		lines 26-31),
			(MOSI), a master in	3:20-45		Amendment of April

Proposed	Claims	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
			slave out line	3:66-4:3		11, 1994, pp. 6-13,
			(MISO), and a serial	4:31-55		Office Action of
			clock line driven by	5:1-9		December 21, 1995
			the master device	Prosecution History,		(reissued July 23,
				Amendment and Remarks		1996), pp. 2-9,
				(Apr. 11, 1994)		Amendment of
				Prosecution History,		October 7, 1996, pp.
				Amendment and Remarks		14-22 (and .
				(Aug. 22, 1994)		accompanying
				Prosecution History,		proposed drawing
				Amendment and Remarks		change for Fig. 4).
				(Oct. 7, 1996)		
				Prosecution History, IDS		
				(May 18, 1992), Motorola		
				Publication ADI 991R2,		
				8-Bit Microcomputers (1985)		
				Prosecution History,		
				Notice of Allowability		
				(June 8, 1997)		
Apple	1-2, 4,	communication	Agreed position:	Claims 1-2, 4, 7-8, 10-14,	Agreed position:	Abstract, 1:46 – 2:2,
	7-8, 10-	initiation signal	A signal that begins a	and 16-17	A signal that begins a	2:26-46, 2:56 – 3:14,
	14, 16-	C	communication	Figs. 1-3, 5-6	communication	4:7-14, 4:26-32, 5:36
	17			Abstract		– 8:47, Amendment of
				1:47-54		April 11, 1994, pp. 6-
				1:64-2:2		13.
				2:31-40		
				2:67-3:8		
				3:14-15		
				3:26-45		
				4:31-55		
				5:1-9		
				Prosecution History,		
				Amendment and Remarks		

Proposed	Claims	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
				(Apr. 11, 1994)		
				Prosecution History,		
				Amendment and Remarks		
				(Oct. 7, 1996)		
				Prosecution History,		
				Notice of Allowability		
				(June 8, 1997)		
Apple	4, 10,	full duplex data	Plain & Ordinary	Claims 4, 10, 13, and 17	Transfer of signals in	Abstract, 1:9-12, 1:55
	13, 17	transference	Meaning	Abstract	both directions during	-2:2, 3:25-44,
				Figs. 1-6	the same time	Amendment of April
			transfer of data in	1:9-13		11, 1994, pp. 6-13,
			both directions during	1:47-2:2		Amendment of
			the same time	2:29-43		October 7, 1996, pp.
				2:57-3:41		14-22.
				4:36-49		
				4:59-64		
				5:1-27		
				Prosecution History, IDS		
				(May 18, 1992), Motorola		
				Publication ADI 991R2,		
				8-Bit Microcomputers		
				(1985)		
				Prosecution History,		
				Amendment 1 and		
				Remarks (Apr. 11, 1994)		
				Prosecution History,		
				Amendment and Remarks		
				(Aug. 22, 1994)		
				Prosecution History,		
				Amendment and Remarks		
				(Oct. 7, 1996)		
Apple	4	providing[,	Plain & Ordinary	Claim 4	Not disclosed. The	5:36 – 8:47.
		during the first	Meaning	Abstract	limitation is therefore	
		clock cycle		Figs. 5-6	indefinite.	

Proposed	Claims	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
		following	providing, during the	1:47-2:2		
		transmission of	first clock cycle	4:26-64		
		the	following	5:1-27		
		communication	transmission of the	Prosecution History,		
		initiation signal,]	communication	Amendment and Remarks		
		a portion of the	initiation signal, a bit	(Apr. 11, 1994)		
		updated register	of the updated register	Prosecution History,		
		information from	information from the	Amendment and Remarks		
		the status register	status register	(Aug. 22, 1994)		
				Prosecution History,		
				Amendment and Remarks		
				(Oct. 7, 1996)		
				Prosecution History,		
				Notice of Allowability		
				(June 8, 1997)		
Apple	10	automatically	Plain & Ordinary	Claims 1, 4, 10, 13, and	Not disclosed. The	5:36 – 8:47.
		providing a	Meaning	17	limitation is therefore	
		portion of the		Abstract	indefinite.	
		status		Fig. 5-6		
		information		1:47-2:2		
		contained in the		4:26-64		
		status register		5:1-27		
				Prosecution History,		
				Amendment and Remarks		
				(Apr. 11, 1994)		
				Prosecution History,		
				Amendment and Remarks		
				(Aug. 22, 1994)		
				Prosecution History,		
				Amendment and Remarks		
				(Oct. 7, 1996)		
				Prosecution History,		
				Notice of Allowability		
				(June 8, 1997)		

Proposed	Claims	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by	1.0	2	Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
HTC and	13	means for	Function:	Claim 13	Subject to § 112, ¶ 6.	1:55 -2:2, 3:36 - 4:32,
Apple		receiving	receiving information	Abstract		5:36 – 8:47, Figs. 4-5.
		information	signals from sources	Figs. 2, 4-5	Function: receiving	
		signals from		1:29-32	information signals from	
		sources	Structure:	1:58-61	sources	
			support circuitry,	2:50-54		
			controller, and	2:64-68	Structure: the controller	
			equivalents	3:16-20	422, status register 421,	
				4:3-28	interrupt source lines	
				5:22-31	(from at least one of	
				Prosecution History,	clock recovery	
				Amendment and Remarks	determination 408, bit	
				(Aug. 22, 1994)	synchronizer 410,	
					modulo timers 406,	
					battery 404, controls	
					418), as shown and	
					interconnected in Fig. 4,	
					which implement at	
					least blocks 201 and 202	
					of the flowchart of Fig.	
					5; and which operate as	
					described at 3:36 to	
					4:32.	
HTC and	13	means for	Function:	Claim 13	Subject to § 112, ¶ 6	1:55 -2:2, 3:36 - 4:28,
Apple		updating the	updating the	Abstract		5:36 – 8:47, Figs. 4-5.
		information	information stored in	Figs. 2, 4, 5	Function: updating the	_
		stored in the	the status register in	1:58-61	information stored in the	
		status register in	response to	2:64-67	status register in	
		response to	information signals	4:21-28	response to the	
		information		4:46-48	information signals	
		signals	Structure:			
			support circuitry,		Structure: the controller	
			controller, and		422, status register 421,	
			equivalents		interrupt source lines	

Proposed	Claims	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
					(from at least two of clock recovery determination 408, bit synchronizer 410, modulo timers 406, battery 404, controls 418), as shown and interconnected in Fig. 4, which implement at least blocks 201 and 202 of the flowchart of Fig. 5, and which operate as described at 3:36 to 4:28.	
HTC and Apple	13	means for automatically providing the updated information to the master device over the SPI in response to the communication initiation signal without first receiving an address of the status register from the master device	Function: automatically providing the updated information to the master device over the SPI in response to the communication initiation signal without first receiving an address of the status register from the master device  Structure: support circuitry, controller, serial peripheral interface (SPI), and equivalents	Claim 13 Abstract Figs. 4-6 1:47-2:2 4:11-64 5:1-27 Prosecution History, Amendment and Remarks (Apr. 11, 1994) Prosecution History, Amendment and Remarks (Aug. 22, 1994) Prosecution History, Amendment and Remarks (Oct. 7, 1996) Prosecution History, Notice of Allowability (June 8, 1997)	Subject to § 112, ¶ 6.  Function: automatically providing updated information to the master device over the SPI in response to the communication initiation signal without first receiving an address of the status register from the master device  Structure: the controller 422, status register 421, interrupt source lines (from at least two of clock recovery	1:55 -2:2, 3:36 – 4:50, 5:36 – 8:47, Figs. 4-6.

Proposed	Claims	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
HTC and Apple	15	means for transmitting, over the SPI and at substantially the same time as the slave device provides the updated information over the SPI, meaningless information that does not address the status register and to which the slave device does not respond	Function: transmitting over the SPI meaningless information that does not address the status register  Structure: microprocessor, serial peripheral interface (SPI), and equivalents	Claim 15 Abstract Figs. 1-6 1:9-13 1:33-35 1:47-2:2 2:29-43 2:57-3:45 4:26-64 5:1-27 Prosecution History, IDS (May 18, 1992), Motorola Publication ADI 991R2, 8-Bit Microcomputers (1985) Prosecution History, Amendment and Remarks (Apr. 11, 1994) Prosecution History, Amendment and Remarks (Aug. 22, 1994)	determination 408, bit synchronizer 410, modulo timers 406, battery 404, controls 418), as shown and interconnected in Fig. 4, which implement the flowchart of Fig. 5 and the timing requirements of Fig. 6; and which operate as described at 3:36 to 4:50.  Subject to § 112, ¶ 6. Function: transmitting, over the SPI and at substantially the same time as the slave device provides the updated information over the SPI, meaningless information that does not address the status register and to which the slave device does not respond  Structure: the controller 422, status register 421, interconnecting lines (from controller 422, support circuitry 421 and controls 418 to microprocessor 403), as	1:55 -2:2, 3:36 – 4:50, 5:36 – 8:47, Figs. 4-6.

Proposed	Claims	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
				Amendment and Remarks	interconnected in Fig. 4,	
				(Oct. 7, 1996)	which implement at	
				Prosecution History,	least blocks 204, 501,	
				Notice of Allowability	502 of the flowchart of	
				(June 8, 1997)	Fig. 5 and the timing	
					requirements of Fig. 6;	
					and which operate as	
					described at 3:36 to	
					4:50.	
Apple	5, 15	substantially	Plain & Ordinary	Claims 5 and 15	Not disclosed. The	1:46-54, 5:36 – 8:47.
		coincident with	Meaning	Abstract	limitation is therefore	
		transmission of		Fig. 1-6	indefinite.	
		the portion of the	during the period of	1:9-13		
		updated register	time that the slave	1:47-2:2		
		information [by	device transmits a bit	2:57-3:41		
		the slave device]	of the updated register	4:33-51		
			information	5:1-27		
		/		Prosecution History,		
			/	Amendment and Remarks		
		substantially the		(Apr. 11, 1994)		
		same time [as the	during the period of	Prosecution History, IDS		
		slave device	time that the slave	(May		
		provides the	device provides the	18, 1992), Motorola		
		updated	updated information	Publication ADI 991R2,		
		information over	over the SPI	8-Bit Microcomputers		
		the SPI]		(1985)		
				Prosecution History,		
				Amendment and Remarks		
				(Oct. 7, 1996)		
Apple	All	Claim preambles <sup>1</sup>			The claim preambles are	Abstract, 1:9-12, 1:55
	asserted				limiting.	- 2:2, 2:26-46, 3:25-

\_\_

<sup>&</sup>lt;sup>1</sup> HTC objects to construing terms that have not been specifically identified by the parties. The parties previously agreed that, "[t]o the extent any term in a preamble requires construction, [the parties] listed such term separately." *See* October 12, 2012 Email from C. Corbett.

Proposed by	Claims	Claim term	HTC's Proposed Construction	HTC's Exemplary Intrinsic Evidence	Apple's Proposed Construction	Apple's Exemplary Intrinsic Evidence
	claims.					44, 3:63 – 4:6, 5:36 –
						8:47, Fig. 1, 4, Office
						Action of January 18,
						1994, pp. 2-11
						(referring to Original
						Specification at p. 6,
						lines 26-31),
						Amendment of April
						11, 1994, pp. 6-13,
						Office Action of
						December 21, 1995
						(reissued July 23,
						1996), pp. 2-9,
						Amendment of
						October 7, 1996, pp.
						14-22 (and
						accompanying
						proposed drawing
						change for Fig. 4).

### II. Patent No. 5,630,159 ("the '159 patent")

Proposed	Claims	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
Apple	1-3, 18-	donor device	A device that provides	Claims 1-3, 18-20, 23-	A device that provides	Abstract, 2:15-17,
	20, 23-		preferences	24, and 32-35	preferences in response	2:21-25, 2:58-65,
	24, 32-			Figs. 1-8, 10-18	to a preference selection	3:38-40, 3:52-58,
	35			Abstract	vector and, if the device	4:20-23, 5:61-66,
				2:37-45	can provide preferences	6:39-8:27, 9:22-10:5,
				2:49-51	for more than one user,	10:24-11:15, 12:63-
				2:58-65	information identifying	16:60, Figs. 1-8, 11-
				3:6-13	a user.	12, 14-15.
				3:27-30		
				3:34-36		
				3:47-52		
				4:32-36		
				5:6-43		
				6:29-38		
				9:22-27		
				10:42-44		
				11:1-16		
				12:30-35		
Apple	1, 18, 19	new preferences <sup>2</sup>	Plain & Ordinary	Claims 1, 18, and 19	Plain and Ordinary	1:42-59, 2:20-23,
			Meaning	Figs. 14-16, 18	Meaning	2:46-48, 4:14-20,
			_	1:49-59		5:61-6:15, 8:47-52,
			settings for initializing	2:46-48		10:6-11:26, 12:4-53,
			or updating attributes	4:16-20		12:63-16:60, Figs. 14-
				10:6-15		17.
				12:4-10		
				12:36-43		
Apple	1, 18, 19	when new	Plain & Ordinary	Claims 1, 18, and 19	When determining	1:42-59, 2:20-23,
		preferences need	Meaning	Figs. 14-18	preferences for the first	2:46-48, 4:14-20,
		to be set-up		1:49-59	time	5:61-6:15, 8:47-52,

\_

<sup>&</sup>lt;sup>2</sup> Apple no longer proposes construing this term. The parties dispute the plain and ordinary meaning of the term "new preferences" and, therefore, HTC maintains that this term must be construed.

Proposed	Claims	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
			when settings for	2:46-48		10:6-11:26, 12:4-53,
			attributes need to be	4:16-20		12:63-16:60, Figs. 14-
			initialized or updated	10:6:15		17.
				11:28-41		
				12:4-20		
				12:36-43		
Apple	1, 18	said controller	Plain & Ordinary	Claims 1 and 18	Said controller	1:42-59, 2:20-23,
		determines the	Meaning	Abstract	determines that new	2:46-48, 3:52-58,
		donor device is		Fig. 7-8, 14-18	preferences need to be	4:14-20, 9:21-55,
		available when	when the 'new	1:49-59	set-up, then determines	10:6-11:26, 12:4-53,
		the new	preferences need to be	2:35-48	the donor device is	12:63-16:60, Figs. 12,
		preferences need	set up', then the	3:13-24	available	14-17.
		to be set-up	controller determines	3:37-40		
			the 'donor device' is	3:52-57		
			available	3:65-4:2		
			See constructions for	4:16-23		
			'new preferences need	4:32-40		
			to be set up' and 'donor	4:64-5:5		
			device'	9:24-27		
				9:49-52		
				10:4-48		
				10:58-61		
				11:28-41		
				12:4-20		
				12:23-43		
Apple	1, 18, 19	said controller	Plain & Ordinary	Claims 1, 18, and 19	Said controller	1:42-59, 2:20-23,
		determines if a	Meaning	Abstract	determines that new	2:46-48, 3:52-58,
		donor device is		Figs. 7-8, 14-18	preferences need to be	4:14-20, 9:21-55,
		available when	when the 'new	1:49-59	set-up, then determines	10:6-11:26, 12:4-53,
		new preferences	preferences need to be	2:35-48	if a donor device is	12:63-16:60, Figs. 12,
		need to be set-up	set up', then the	3:13-24	available.	14-17.
			controller determines if	3:37-40		
		/	the 'donor device' is	3:52-57	/	
			available	3:65-4:2		

Proposed	Claims	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
~		determining if a donor device is available when new preferences need to be set-up	when the 'new preferences need to be set up', then determining if the 'donor device' is available  See constructions for 'new preferences need to be set up' and 'donor device'	4:16-23 4:32-40 4:64-5:5 9:24-27 9:49-52 10:4-48 10:58-61 11:28-41 12:4-20 12:36-43	Determining that new preferences need to be set-up, then determining if a donor device is available	
Apple	1, 18	said controller connects to the donor device when said controller determines the donor device is available when the new preferences need to be set up	Plain & Ordinary Meaning  when the 'new preferences need to be set up', then the controller determines the 'donor device' is available, then the controller connects to the 'donor device'  See constructions for 'new preferences need to be set up' and 'donor device'	Claims 1 and 18 Figs. 7, 14, 17 3:38-41 4:54-59 5:1-43 10:42-46 12:22-35	Said controller determines that new preferences need to be set up, then determines that the donor device is available, then connects to the donor device.	1:42-59, 2:20-23, 2:46-48, 3:52-58, 4:14-20, 9:21-55, 10:6-11:26, 12:4-53, 12:63-16:60, Figs. 12, 14-17.
Apple	19	temporarily assign preferences	Plain & Ordinary Meaning set preferences until	Claims 19, and 21-22 Fig. 14-15 4:5-13 8:10-32	Indefinite.	3:41-13, 8:28-52, 10:6-11:15, 11:49- 12:3, 12:63-16:60, Figs. 6, 14-16.

Proposed by	Claims	Claim term	HTC's Proposed Construction	HTC's Exemplary Intrinsic Evidence	Apple's Proposed Construction	Apple's Exemplary Intrinsic Evidence
Dy			changed by user or	Intrinsic Evidence	Construction	Intrinsic Evidence
			'donor device'			
Apple	20	providing to the	Plain & Ordinary	Claim 20	The donor device must	1:42-59, 2:20-23,
прри	20	donor device	Meaning	Figs. 7-8, 11-12, 14, 17	be available at some	2:46-48, 3:52-58,
		information for	1710aming	Abstract	time, and when it is,	4:14-20, 9:21-55,
		access of the	See construction for	2:35-45	providing to the donor	10:6-11:26, 12:4-53,
		donor device for	'donor device'	3:13-24	device information for	12:63-16:60, Figs. 12,
		a particular user		3:37-40	access of the donor	14-17.
		when the donor		3:52-57	device for a particular	
		device is		3:65-4:2	user.	
		available		4:16-23		
				4:32-40		
				4:64-5:5		
				7:60-8:9		
				9:21-55		
				10:16-24		
				10:40-48		
				10:58-61		
				11:7-9		
A 1 -	19		District O Outlines	12:23-35 Claims 19 and 20	C 1' 4 - 41 - 1	A1
Apple	19	accessing the	Plain & Ordinary		Sending to the donor	Abstract, 2:15-17,
		donor device	Meaning	Fig. 11-12, 14-16 Abstract	device a preference selection vector and, if	2:21-25, 2:58-65, 3:38-40, 3:52-58,
			See construction for	2:42-45	the donor device can	4:20-23, 5:61-66,
			'donor device'	3:34-41	provide the preferences	6:39-8:27, 9:22-10:5,
			dollor device	3:52-58	for more than one user,	10:24-11:15, 12:63-
				4:54-5:5	information identifying	16:60, Figs. 1-8, 11-
				5:67-6:3	a user	12, 14-15.
				9:24-27		1=, 1 . 10.
				10:6-31		
Apple	19	accessing the	Plain & Ordinary	Claims 19 and 20	The donor device must	1:42-59, 2:20-23,
		donor device	Meaning	Fig. 11-12, 14-16	be available at some	2:46-48, 3:52-58,
		when the donor		Abstract	time, and when it is,	4:14-20, 9:21-55,
		device is	See construction for	2:42-45	accessing the donor	10:6-11:26, 12:4-53,

Proposed by	Claims	Claim term	HTC's Proposed Construction	HTC's Exemplary Intrinsic Evidence	Apple's Proposed Construction	Apple's Exemplary Intrinsic Evidence
		available	'donor device'	3:34-41 3:52-58 4:54-5:5 5:67-6:3 9:24-27 10:6-31	device.	12:63-16:60, Figs. 1-8, 12, 14-17.
HTC	18, 35	attached donor device	application device that can act as both an application device and a 'donor device' at the same time  See construction for 'donor device'	Claims 18 and 35 3:49-64	A device that acts as both an application device and a donor device at the same time.	3:31-4:13, 12:63- 16:60, Fig. 6.
HTC	1, 18	a port for coupling	an interface for wired or wireless communication	Claims 1, 6, 7, 15, 16, and 18 Figs. 7-8, 14, and 17 2:60-65 3:31-41 4:32-5:47 5:63-6:3 10:42-46 12:22-35	A port for communicating with physically co-located devices.	3:31-4:13, 5:6-6:15, 12:63-16:60, Figs. 1-8.
Apple	1, 18	obtain preferences from the donor device / obtain and store preferences from the donor device <sup>3</sup>	Plain & Ordinary Meaning receive and store preferences from the 'donor device'	Claims 1 and 18 Abstract 5:67-6:2 6:25-28 12:22-35 12:63-13:11 15:11-25	Receiving preferences by sending to the donor device a preference selection vector and, if the donor device can provide preferences for more than one user,	Abstract, 2:15-17, 2:21-25, 2:58-65, 3:38-40, 3:52-58, 4:20-23, 5:61-66, 6:39-8:27, 9:22-10:5, 10:24-11:15, 12:63- 16:60, Figs. 11-12, 14-

<sup>&</sup>lt;sup>3</sup> Apple no longer proposes construing "obtain and store preferences from the donor device" and proposes construing only "obtain ... preferences from the donor device." HTC disagrees with this approach. HTC believes that the full term ("obtain and store preferences from the donor device") is necessary and must be construed to provide the appropriate context.

Proposed by	Claims	Claim term	HTC's Proposed Construction	HTC's Exemplary Intrinsic Evidence	Apple's Proposed Construction	Apple's Exemplary Intrinsic Evidence
			See construction for 'donor device'		information identifying	15.
			donor device		a user	
					Receiving and storing preferences by sending to the donor device a preference selection vector and, if the donor device can provide preferences for more than one user, information identifying a user.	
Apple	All asserted claims.	Claim preambles. <sup>4</sup>			The claim preambles are limiting.	1:9-12, 2:15-27, 9:22- 12:10, 12:63-16:60, Figs. 12-18.

<sup>&</sup>lt;sup>4</sup> See footnote 1.

# III. Patent No. 5,418,524 ("the '524 patent")

Proposed	Claim	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
HTC and	1-5	selective call	device that receives	Claims 1-5	A radio modem.	Abstract, 1:14-21, 2:1-
Apple		receiver	radio frequency (RF)	Abstract		35, 3:5-11, 5:3-41,
			signals	Figs. 1, 4		5:54-64, 5:66-8:10.
				1:19-40		
				1:52-54		
				1:65-68		
				2:3-11		
				2:55-64		
				5:3-26		
				5:58-62		
				Prosecution History,		
				Amendment and		
				Remarks (Dec. 23,		
				1994)		
				Prosecution History,		
				Office Action (June 23,		
				1994)		
				Prosecution History,		
				Notice of Allowability		
				(Feb. 14, 1995)		
Apple	1-2, 5	upgrade	Plain & Ordinary	Claims 1-2, and 5	Uncompiled source	Abstract, 2:1-35, 5:27-
		installation	Meaning	Abstract	code for upgrading	65, 5:66-8:10, Fig. 4;
		software		Fig. 4	application software.	Applicant Amendment
				1:42-68		dated December 23,
				2:1-35		1994, pp. 3-8.
				5:3-64		
				Prosecution History,		
				Amendment and		
				Remarks (Dec. 23,		
				1994)		
				Prosecution History,		
				Notice of Allowability		
				(Feb. 14, 1995)		

Proposed	Claim	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
Apple	3-4	upgrade installation information	Plain & Ordinary Meaning	Claims 3-4 Abstract Fig. 4 1:42-68 2:1-35 5:3-64 Prosecution History, Amendment and Remarks (Dec. 23, 1994) Prosecution History, Notice of Allowability (Feb. 14, 1995)	Uncompiled source code for upgrading application software.	Abstract, 2:1-35, 5:27-65, 5:66-8:10, Fig. 4; Applicant Amendment dated December 23, 1994, pp. 3-8.
Apple	1, 5	data interface	Plain & Ordinary Meaning	Claims 1 and 5 Fig. 1 2:3-35 3:12-14 3:47-56 Prosecution History, Amendment and Remarks (Dec. 23, 1994)	A PCMCIA data interface.	3:12-31, 3:56-68, 5:66- 8:10, Figs. 1-3, Applicant Amendment dated December 23, 1994, pp. 3-8.
Apple	1-5	coupled to	Plain & Ordinary Meaning connected to	Claims 1-5 Figs. 1, 3 1:23-31 2:16-22 2:25-28 2:55-3:2 3:12-21 3:30-31 3:63-68 5:44-62	Directly connected to.	2:1-35, 2:55-3:2, 3:12-31, 3:57-68, 5:42-65, 5:66-8:10, Figs. 1-3.
Apple	3-4	compiling the upgrade	Plain & Ordinary Meaning	Claims 3-4 Fig. 4	Translating the upgrade installation information	Abstract, 2:1-35, 5:27-65, 5:66-8:10, Fig. 4;

Proposed by	Claim	Claim term	HTC's Proposed Construction	HTC's Exemplary Intrinsic Evidence	Apple's Proposed Construction	Apple's Exemplary Intrinsic Evidence
		installation information	converting the upgrade installation information to executable form	Abstract 2:16-22 5:30-36 5:45-53	from uncompiled source code into an executable form.	Applicant Amendment dated December 23, 1994, pp. 3-8.
Apple	1, 2, 5	in response to the upgrade data / upgrading the application software in response to the upgrade data <sup>5</sup>	upgrading the application software utilizing the upgrade data	Claims 1, 2, and 5 Abstract Fig. 4 2:16-22 5:27-53	Caused by the upgrade data / Upgrading the application software caused by the upgrade data.	Abstract, 2:23-35, 3:47-56, 4:48-60, 5:66- 8:10, Fig. 4; Applicant Amendment dated December 23, 1994, pp. 3-8.
Apple	3	second memory means coupled to the receiving means for storing the information	Plain & Ordinary Meaning  Not 112, p. 6  See construction for  'receiving means'	Claim 3 Fig. 1 2:6-12 2:64-67 4:52-60 5:19-50	Subject to § 112, ¶ 6.  Function: storing the information  Structure: Not sufficiently disclosed.  The limitation is therefore indefinite.	2:1-35, 2:55-3:2, 3:12-46, 3:57-68, 5:14-65, 5:66-8:10, Figs. 1-3.
Apple	4	memory means coupled to the receiving means for storing the upgrade information	Plain & Ordinary Meaning  Not 112, p. 6  See construction for  'receiving means'	Claim 4 Fig. 1 2:6-12 2:64-67 4:52-60 5:19-50	Subject to § 112, ¶ 6.  Function: storing the upgrade information  Structure: None disclosed.  The limitation is	2:1-35, 2:55-3:2, 3:12-46, 3:57-68, 5:14-65, 5:66-8:10, Fig. 1.

<sup>&</sup>lt;sup>5</sup> Apple no longer proposes construing "upgrading the application software ... in response to the upgrade data," and proposes construing only "in response to the upgrade data." HTC disagrees with this approach. HTC believes that the full term ("upgrading the application software . . . in response to the upgrade data") is necessary and must be construed to provide the appropriate context.

Proposed	Claim	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
					therefore indefinite.	
HTC and	3-4	control means	Function:	Claims 3-4	Subject to § 112, ¶ 6.	Abstract, 2:1-35, 2:55-
Apple		coupled to the	compiling the upgrade	Abstract	-	3:2, 3:12-31, 5:27-65,
		first and the	installation information	Figs. 1, 4	Function: compiling	5:66-8:10, Figs. 1, 4;
		second memory	and executing the	Abstract	the upgrade installation	Applicant Amendment
		means for	compiled upgrade	2:16-22	information and	dated December 23,
		compiling the	installation information	5:30-36	executing the compiled	1994, pp. 3-8.
		upgrade	in accordance with the		upgrade installation	
		installation	upgrade data to		information in	
		information and	upgrade the application		accordance with the	
		for executing the	software		upgrade data to	
		compiled upgrade			upgrade the application	
		installation	Structure:		software	
		information in	microprocessor, and			
		accordance with	equivalents		Structure:	
		the upgrade data			microprocessor 108 as	
		to upgrade the			described by 3:47-56.	
		application			/	
		software			Subject to § 112, ¶ 6.	
		/			Function: compiling	
					the upgrade installation	
		control means			information and	
		coupled to a first			executing the compiled	
		and a second			upgrade installation	
		memory means			information in	
		for compiling the			accordance with the	
		upgrade			upgrade data to	
		installation			upgrade the application	
		information and			software	
		for executing the				
		compiled upgrade			Structure:	
		installation			microprocessor 108 as	
		information in			described by 3:47-56.	

Proposed	Claim	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
HTC and Apple	3-4	accordance with the upgrade data to upgrade the application software  receiving means for receiving and decoding the selective call radio signals to recover the information transmitted therein  /  receiving means for receiving and decoding the selective call radio signals to receiving means for receiving and decoding the selective call radio signals to recover the upgrade information transmitted therein	Function: receiving and decoding the selective call radio signals to recover the information transmitted therein  Structure: receiver and decoder, and equivalents	Claims 3-4 Abstract Figs. 1, 4 1:19-40 1:52-54 1:65-68 2:3-11 2:55-64 5:3-26 5:58-62 Prosecution History, Amendment and Remarks (Dec. 23, 1994) Prosecution History, Office Action (June 23, 1994) Prosecution History, Notice of Allowability (Feb. 14, 1995)	Subject to § 112, ¶ 6.  Function: receiving and decoding the selective call radio signals to recover the information transmitted therein / receiving and decoding the selective call radio signals to recover the upgrade information transmitted therein  Structure: Receiver 104 and decoder 106 as described by 2:58-61.	1:20-34, 2:55-3:2, 5:14-26, 5:66-8:10, Fig. 1.
HTC and Apple	4	data interface means for coupling with an external computer means to transmit	Plain & Ordinary Meaning Not 112, p. 6.	Claim 4 Figs. 1-3 Abstract 1:19-31 2:12-15 2:25-28	Subject to § 112, ¶ 6.  Function: coupling with an external computer means to transmit information	3:12-31, 3:56-68, 5:66- 8:10, Figs. 1-3, Applicant Amendment dated December 23, 1994, pp. 3-8.

Proposed	Claim	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
		information		3:12-31	thereto	
		thereto		3:57-68		
				5:42-53	Structure: a PCMCIA	
				Prosecution History,	data interface	
				Amendment and		
				Remarks (Dec. 23,		
				1994)		
HTC and	5	means coupled to	Function:	Claim 5	Subject to § 112, ¶ 6.	3:12-31, 3:56-68, 5:66-
Apple		the data interface	establishing	Figs. 1-2		8:10, Figs. 1-3;
		for establishing	communication	3:30-31	Function: establishing	Applicant Amendment
		communication	between the 'selective	3:63-68	communication	dated December 23,
		between the	call receiver' and the		between the selective	1994, pp. 3-8.
		selective call	external computer		call receiver and the	
		receiver and the	G.		external computer	
		external	Structure:		C. DOMOLA	
		computer	bus, and equivalents		Structure: a PCMCIA	
TITC 1	_	C	Function:	Claim 5	bus S. 1.1.2. T. C.	1 20 24 2 55 2 2
HTC and	5	means for			Subject to § 112, ¶ 6.	1:20-34, 2:55-3:2,
Apple		receiving upgrade information	receiving upgrade	Abstract	Even ations, no acivin a	5:14-26, 5:66-8:10, Fig.
		comprising	information comprising upgrade installation	Figs. 1, 4 1:19-40	Function: receiving upgrade information	1.
		upgrade	software and upgrade	1:52-54	comprising upgrade	
		installation	data for re-	1:65-68	installation software	
		software and	programming the	2:3-11	and upgrade data for	
		upgrade data for	external computer	2:28-35	re-programming the	
		re-programming	external computer	2:55-64	external computer	
		the external	Structure:	5:3-26	external compater	
		computer	receiver, and	5:58-62	Structure: receiver 104	
		1	equivalents	Prosecution History,	as described by 2:58-	
			•	Amendment and	60.	
				Remarks (Dec. 23,		
				1994)		
				Prosecution History,		
				Notice of Allowability		

Proposed	Claim	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
				(Feb. 14, 1995)		
HTC and	5	means for loading	Function:	Claim 5	Subject to § 112, ¶ 6.	1:48-65, 2:23-35, 3:32-
Apple		the upgrade	loading the upgrade	Fig. 1		45, 5:66-8:10, Figs. 1,
		installation	installation software	2:28-35	Function: loading the	4.
		software into the	into the processor	2:62-67	upgrade installation	
		processor		5:30-32	software into the	
			Structure:		processor	
			memory and			
			microprocessor, and		Structure: None	
			equivalents		disclosed.	
					The limitation is	
					therefore indefinite.	
HTC and	5	means for	Function:	Claim 5	Subject to § 112, ¶ 6.	2:1-22, 3:12-4:23,
Apple		upgrading the	upgrading the	Figs. 1, 4		5:42-64, 5:66-8:10,
		application	application software	2:28-35	Function: upgrading	Figs. 3, 4.
		software stored in	stored in a memory	5:27-36	the application	
		a memory	resident in the external	5:45-53	software stored in a	
		resident in the	computer in accordance	Prosecution History,	memory resident in the	
		external	with the upgrade	Amendment and	external computer in	
		computer in	installation software	Remarks (Dec. 23,	accordance with the	
		accordance with	and 'in response to the	1994)	upgrade installation	
		the upgrade	upgrade data'	Prosecution History,	software and in	
		installation		Notice of Allowability	response to the upgrade	
		software and in	Structure:	(Feb. 14, 1995)	data	
		response to the	microprocessor, data			
		upgrade data	interface, bus, memory,		Structure: None	
			and equivalents		disclosed.	
			See construction for		The limitation is	
			'[upgrading the		therefore indefinite.	
			application software			
			] in response to the			
			upgrade data'			

Proposed by	Claim	Claim term	HTC's Proposed Construction	HTC's Exemplary Intrinsic Evidence	Apple's Proposed Construction	Apple's Exemplary Intrinsic Evidence
HTC and	5	means for	Function: deleting the	Claim 5	Subject to § 112, ¶ 6.	2:23-35, 5:36-41, 5:66-
Apple		deleting the	upgrade installation	Fig. 4		8:10.
		upgrade	software and the	2:28-35	Function: deleting the	
		installation	upgrade data	5:36-41	upgrade installation	
		software and the		Prosecution History,	software and the	
		upgrade data	Structure:	Notice of Allowability	upgrade data	
			microprocessor,	(Feb. 14, 1995)		
			memory, and		Structure: None	
			equivalents		disclosed. The	
					limitation is therefore	
					indefinite.	
Apple	All	Claim			The claim preambles	2:1-35, 5:54-64, 5:66-
	asserted	preambles. <sup>6</sup>			are limiting.	8:10, Figs. 1-4;
	claims.					Applicant Amendment
						dated December 23,
						1994, pp. 3-8.

<sup>&</sup>lt;sup>6</sup> See footnote 1.

# IV. Patent No. 5,302,947 ("the '947 patent")

Proposed by	Claim	Claim term	HTC's Proposed Construction	HTC's Exemplary Intrinsic Evidence	Apple's Proposed Construction	Apple's Exemplary Intrinsic Evidence
HTC and	1, 3, 12-	selective call	device that receives	Claims 1, 3, and 12-18	A radio modem.	Abstract, 1:13-21,
Apple	1, 3, 12-	receiver	radio frequency (RF)	Figs. 1-3	A radio modem.	1:66 – 2:41, 3:12-19,
Apple	10	Tecerver	signals	Abstract		6:6 – 10:9.
			Signais	1:7-10		0.0 – 10.9.
				1:13-25		
				1:28-34		
				2:18-22		
				2:63-3:4		
				3:13-19		
				5:38-46		
				Prosecution History,		
				Office Action (Sept. 14,		
				1993)		
Apple	1, 3, 5,	coupling	Plain & Ordinary	Claims 1, 3, 5, 12	directly connecting	1:17-25, 1:66 – 2:41,
Apple	1, 3, 3,	Couping	Meaning	Abstract	directly connecting	4:1-22, 5:57 – 6:4, 6:6
	12		Wieannig	Figs. 1, 3-4		- 10:9, Figs.1-4.
			connecting	1:21-25		– 10.9, 11gs.1-4.
			Connecting	1:66-2:9		
				2:18-25		
				2:32-42		
				2:66-3:10		
				3:20-27		
				4:1-18		
				5:67-6:4		
Apple	1-5, 7-8,	in response to	Plain & Ordinary	Claims 1-5, 7-8, 11-12,	Caused by.	Abstract, 1:46-52,
Apple	11-12,	in response to	Meaning	14-15, and 18	Caused by.	1:66 – 2:18, 2:31-41,
	14-15,		Wieannig	Abstract		3:53-62, 3:63 – 4:7,
	14-13,			1:46-52		5:34-46, 5:57 – 6:4,
	10			3:53-57		5:54-40, 5:57 – 6:4, 6:6 – 10:9.
				4:18-22		0.0 - 10.7.
				5:34-46		
				5:67-6:4		
				3.07-0.4		
		1				

Proposed	Claim	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
HTC and	5-11	selective call	device that receives	Claims 5-11	Subject to § 112, ¶ 6.	Abstract, 1:13-21,
Apple		receiver means	radio frequency (RF)	Fig. 1-3		1:66 – 2:41, 3:12-19,
		for receiving and	signals	Abstract	Function: receiving and	6:6-10:9.
		decoding		1:7-10	decoding selective call	
		selective call	Not 112, p. 6.	1:13-15	radio signals comprising	
		radio signals		1:28-34	information	
		comprising		2:18-22		
		information		2:63-3:4	Structure: a radio	
				3:13-19	modem	
				5:38-46		
				Prosecution History,	In the event this term is	
				Office Action (Sept. 14,	determined not to be	
				1993)	subject to § 112, ¶ 6, the	
					meaning of the term is	
					"a radio modem".	
HTC	5	data interface	Plain & Ordinary	Claims 5 and 9	Subject to § 112, ¶ 6.	Abstract, 3:20-37,
		means for	Meaning	Figs. 1 and 4	3 0 / 11	3:63-4:6, 6:6-10:9,
		coupling with an	6	Abstract	Function: coupling with	Figs. 1-3, Applicant
		external	Not 112, p. 6.	1:7-10	an external computer	Amendment dated
		computer means	, I	1:21-25	means for transmitting	December 23, 1994,
		for transmitting		1:66-2:3	information to the	pp. 3-8 in related U.S.
		information to the		2:18-37	external computer	Pat. 5,148,524 (see id.
		external		3:20-37	means	at col. 1:6-11).
		computer means		3:53-57		,,,
		r		4:1-6	Structure: a PCMCIA	
				4:32-45	data interface.	
Apple	5	memory means	Plain & Ordinary	Claims 5 and 12	Subject to § 112, ¶ 6.	2:18-41, 6:6-10:9,
11		coupled to the	Meaning	Figs. 1 and 4	J 0 7	Figs. 1, 4.
		data interface		Abstract	Function: allowing	8,
		means for	Not 112, p. 6	2:23-32	access to the memory	
		allowing access	, , , , , , , , , , , , , , , , , , ,	3:20-27	means by the external	
		to the memory		3:38-44	computer means	
		means by the		4:1-6	r	
		external		4:32-45	Structure: None	

Proposed	Claim	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
		computer means			disclosed.  The limitation is therefore indefinite.	
Apple	12	a memory coupled to the data interface for allowing access to the memory by the external computer	Plain & Ordinary Meaning	Claims 5 and 12 Figs. 1 and 4 Abstract 2:23-32 3:20-27 3:38-44 4:32-45	See above, but Apple did not provide a construction.  None disclosed. The limitation is therefore indefinite.	
HTC and Apple	5	computer recognition means coupled to the data interface means for recognizing one of a plurality of specific types of external computer in response to signals provided to the data interface means by the external computer	Function: recognizing one of a plurality of specific types of external computer in response to signals provided to the data interface means by the external computer  Structure: computer recognition element, microprocessor, memory, identifier, steps 404, 406, 408, and equivalents	Claim 5 Fig. 1 and Fig. 4 Abstract 2:32-37 3:38-42 3:53-62 4:14-39	Subject to § 112, ¶ 6.  Function: recognizing one of a plurality of specific types of external computer in response to signals provided to the data interface means by the external computer.  Structure: microprocessor 108 and block 109 directly connected to the PCMCIA interface for executing a program which performs the functional operations set forth in Fig. 4, and explained at 4:7-26.	Abstract, 2:18-41, 3:53-62, 4:7-26, 6:6-10:9, Figs. 1, 4.
HTC and	5	driver selection	Function:	Claim 5	Subject to § 112, ¶ 6.	Abstract, 2:18-41,
Apple		means coupled to	selecting one of the	Figs. 1 and 4		3:53-62, 4:7-45, 6:6-

Proposed	Claim	Claim term	HTC's Proposed	HTC's Exemplary	Apple's Proposed	Apple's Exemplary
by			Construction	Intrinsic Evidence	Construction	Intrinsic Evidence
		the computer recognition means for selecting one of the plurality of executable software driver programs compatible with a recognized one of the plurality of specific types of external computer	plurality of executable software driver programs compatible with a recognized one of the plurality of specific types of external computer  Structure: driver selection element, microprocessor, memory, identifier, steps 406, 408, and equivalents	Abstract 2:37-42 3:38-42 3:53-62 4:14-39	Function: selecting one of the plurality of executable software driver programs compatible with a recognized one of the plurality of specific types of external computer  Structure: microprocessor 108 and block 111 executing a program which performs the functional operations set forth in Fig. 4, and explained at 4:7-45.	10:9, Figs. 1, 4.
Apple	6, 11, 13, 18	single, invariant, high-level application programming interface compatible with all the specific types of external computer that have a corresponding software driver program in the plurality of software driver programs	Plain & Ordinary Meaning  a consistent interface between high-level and low-level software, compatible with all the specific types of external computer that have a corresponding software driver program in the plurality of software driver programs	Claims 6, 11, 13, and 18 1:38-61 4:58-5:9 5:15-28	Not disclosed. The limitation is therefore indefinite.	1:38-42, 3:38-51, 5:10-33, 5:47-56, 6:6 – 10:9.

Proposed by	Claim	Claim term	HTC's Proposed Construction	HTC's Exemplary Intrinsic Evidence	Apple's Proposed Construction	Apple's Exemplary Intrinsic Evidence
Apple	All asserted claims.	Claim preambles. <sup>7</sup>			The claim preambles are limiting.	1:66 – 2:41, 5:57 – 6:4.

 $<sup>\</sup>frac{7}{}$  See footnote 1.